

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JGIAP RH 160 LLC,

**Case No.: 1:21-cv-2849 (DG) (JRC)**

Plaintiff,

**NOTICE OF MOTION**

-against-

CRI HOLDING CORP., TOURAJ  
NAGHIEH, MORALI AND ASSOCIATES,  
ANTHONY MORALI, JOSEPH MORALI,  
MANDA INTERNATIONAL  
CORPORATION, STRIKEFORCE  
MECHANICAL CORPORATION, AND  
ANGELO CORRAO,

*ORAL ARGUMENT REQUESTED*

Defendants.

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**PLEASE TAKE NOTICE**, that upon the accompanying memorandum of law in support, declaration of Emanuel Kataev, Esq. in support with accompanying exhibits, and all the prior papers and proceedings herein, Defendants Manda International Corp., Strikeforce Mechanical, Inc., and Angelo Corrao will move this Court, before the Hon. Diane Gujurati, U.S.D.J., at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Courtroom 4B South, Brooklyn, NY 11201-1804, for an Order: (i) dismissing the complaint for lack of subject matter jurisdiction and/or for failure to state a claim upon which relief can be granted pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure (hereinafter “Rules” or “Rule”); (ii) declining to exercise supplemental jurisdiction over any pendant state law claims pursuant to 28 U.S.C. § 1337; and (iii) for such other and further relief as this honorable Court deems just, equitable, and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to this Court’s Order dated March 29, 2022, Plaintiff’s opposition papers are due on Tuesday, May 10, 2022;

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the same Order, Defendants' Manda International Corp., Strikeforce Mechanical, Inc., and Angelo Corrao's reply papers in further support are due on Tuesday, May 24, 2022.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to this Court's Individual Practice Rules ¶ III(B)(4), no motion papers shall be filed until Tuesday, May 24, 2022, when Defendants' Manda International Corp., Strikeforce Mechanical, Inc., and Angelo Corrao shall file all motion papers.

Dated: Lake Success, New York  
April 11, 2022

**MILMAN LABUDA LAW GROUP PLLC**

/s/

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Manda International Corp.  
and Angelo Corrao*